

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION

UNITED STATES OF AMERICA,

CASE NO: 1:02-CR-34-MMP

Plaintiff,

vs.

SHAUN EDWARD SEIFER,

Defendant.

MOTION FOR EARLY TERMINATION OF PROBATION

The Defendant, **SHAUN EDWARD SEIFER**, through his undersigned counsel, moves this court for entry of an order terminating the probation, and as grounds therefore would show:

1. On April 22, 2003, the Defendant was placed on five (5) years probation for the alleged criminal offense regarding child pornography.
2. The Defendant has served 29 months of supervision and has abided by all conditions of supervision and paid all fines, court costs and costs of supervision.
3. Defendant has attended and actively participated in weekly group meetings and programs with therapist, Debra Baker of Network Counseling, and is currently attending the Monthly Maintenance Group as directed. A copy of the August 2005 Treatment Status Report is attached as Exhibit "A".

4. Additionally, a copy of correspondence from Dr. David J. Borrelli, Defendant's treating psychiatrist, is attached as Exhibit "B" for the Court's review.
5. The Defendant graduated September 28, 2005 from Holy Cross College, Worcester, Massachusetts with the degree of Certified Medical Assistant, in the Phlebotomy & EKG Training Program. A copy of the Certificate is attached as Exhibit "C".
6. Defendant is employed full-time as an assistant manager at Radio Shack in Franklin, Massachusetts. Ultimately, the Defendant would like utilize his medical training to obtain a position as a medical assistant.
7. The undersigned has conferred with Gregory P. McMahon, United States Assistant State Attorney, and is authorized to represent to the Court that the Government takes no position on the motion and will leave it to the Court's discretion.
8. All exhibits referenced herein are filed separately with the Court.

WHEREFORE, the Defendant respectfully requests early termination of the probation heretofore imposed in this case.

I HEREBY CERTIFY that a true copy of the foregoing instrument has been furnished to Gregory P. McMahon, Assistant United States Attorney, 300 East University Avenue, 3rd Floor, Gainesville, Florida 32601, by electronic filing on this 1st of December, 2005.

LAW OFFICES OF TERRY N. SILVERMAN, PA

/s/ Terry N. Silverman

TERRY N. SILVERMAN, ESQUIRE

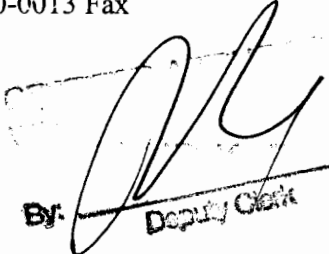
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Counsel for Defendant

By: 
Deputy Clerk